



U.S. Department of Justice

*United States Attorney
Southern District of New York*

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

March 4, 2022

Via ECF

The Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square, Courtroom 443
New York, New York 10007

Re: United States v. Gomez and Younes Arboleda, 18 Cr. 262 (VEC)

Dear Judge Caproni:

The parties jointly write pursuant to the Court's January 21, 2022 Order. (Dkt. 100). The defendants report that they continue to review discovery material provided by the Government, including Spanish-language recordings and draft transcripts, and easing of restrictions on legal visitations to the prison facilities have allowed counsel to begin reviewing this material in-person with their clients. That review remains ongoing, due in part to the volume of discovery and because the material is in a foreign language. The parties otherwise do not have any updates for the Court in advance of the March 15, 2022 conference. If the Court adjourns the conference, the defendants consent to an exclusion of time through the new date, under the Speedy Trial Act, 18 U.S.C. § 3161, so that defense counsel can continue to review the discovery material, because the defendants' motions are pending, and due to the COVID-19 pandemic.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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cc: Defense counsel (by ECF)